

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Federal-State Joint Board on</b>	)	
<b>Universal Service</b>	)	<b>CC Docket No. 96-45</b>
	)	
<b>Advantage Cellular Systems, Inc.</b>	)	
	)	
<b>Application for Designation as an</b>	)	
<b>Eligible Telecommunications Carrier</b>	)	
<b>in the State of Tennessee</b>	)	

**To: Wireline Competition Bureau**

**SUPPLEMENT TO PETITION OF ADVANTAGE CELLULAR SYSTEMS, INC.  
TO BE DESIGNATED AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

**ADVANTAGE CELLULAR  
SYSTEMS, INC.**

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Dated: February 17, 2004

## SUMMARY

In light of the *Virginia Cellular Order*, Advantage submits this Supplement to modify its Petition filed on August 8, 2003. Specifically, Advantage demonstrates that after completion of the balancing analysis required by the *Virginia Cellular Order*, designation of Advantage as an ETC remains in the public interest; that the impact of its ETC designation on the Universal Service Fund will be minimal; its wireless universal service offering will provide unique services to consumers in rural Tennessee; its universal service offering will include a combination of its wireless network infrastructure, roaming arrangements with other wireless service providers, and resale agreements with other wireline carriers in Tennessee; it is committed to providing quality and reliable service in its designated area; and it will comply with the ongoing conditions imposed on Virginia Cellular.

To the extent necessary, Advantage requests redefinition of the service areas of the affected rural telephone companies at the wire center level as established in the *Virginia Cellular Order*. Advantage has provided a population density study that reveals that Advantage is not serving only the low-cost, high density wire centers, and therefore, is not attempting to cream skim. Accordingly, Advantage respectfully requests that the FCC designate it as an ETC in Tennessee.

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Advantage Cellular Systems, Inc. (“Advantage”), by its attorneys, hereby supplements its Petition to be Designated as an Eligible Telecommunications Carrier (“ETC”) in the state of Tennessee (“Petition”).<sup>1</sup> On May 9, 2003, Advantage filed its Petition with the Federal Communications Commission (“FCC” or “Commission”). On August 8, 2003, Advantage’s attorneys met with FCC staff who encouraged Advantage to supplement its original filing: (1) to modify of Advantage’s proposed Universal Service coverage area; (2) to provide maps and specifics on densities per wire center in the rural wire centers; (3) to specify how Advantage will use the Universal Service Fund (“USF”)

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<sup>1</sup> *In the Matter of Federal-State Joint Board on Universal Service, Advantage Cellular Systems, Inc., Application for Designation as an Eligible Telecommunications Carrier in the State of Tennessee*, CC Docket No. 96-45 (May 9, 2003) (“Petition”).

support it requests; (4) to provide Tennessee maps showing wire centers overlapping Advantage's cellular coverage area; and (5) to comply with anticipated future FCC requirements to become an ETC.<sup>2</sup> Advantage is also updating its Petition to reflect that Mr. Leslie Greer has replaced Mr. Wayne Gassaway as the General Manager of Advantage.

## **I. A Grant of The Petition Will Serve the Public Interest**

The FCC has recently clarified the framework for evaluating the public interest when designating ETCs in rural ILEC areas.<sup>3</sup> In the *Virginia Cellular Order*, the FCC found that the benefit of increased competition, while an important objective of telecommunications policy, is no longer by itself sufficient to meet the public interest standard in rural areas. Rather, the Commission will now engage in a more complex balancing analysis in considering ETC requests. Specifically, the Commission has indicated that it will weigh numerous factors in making the public interest determination, including the benefits of increased competition, the impact of its designation on the USF, the unique advantages and disadvantages of the carrier's service offering, any commitments made by the carrier with respect to quality of service, and the carrier's ability to provide the supported services throughout its designated service territory within a reasonable time frame.<sup>4</sup> The FCC stated that it will apply the regulatory process established in the *Virginia Cellular Order* to all future requests for ETC designation in

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<sup>2</sup> The specific requirements discussed by FCC staff have largely been incorporated in the FCC's recent *Virginia Cellular Order*. *In the Matter of Federal-State Joint Board on Universal Service, Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier In the Commonwealth of Virginia, Memorandum Opinion and Order*, CC Docket No. 96-45, FCC 03-338 (rel. January 22, 2004) ("Virginia Cellular Order").

<sup>3</sup> See generally *Virginia Cellular Order*.

<sup>4</sup> *Virginia Cellular Order* at ¶ 4.

rural areas pending further action by the Commission or the Federal-State Joint Board on Universal Service (“Joint Board”).

Advantage demonstrates herein that after completion of the balancing analysis required by the *Virginia Cellular Order*, designation of Advantage as an ETC remains in the public interest. Specifically, Advantage illustrates its compliance with the FCC’s new public interest standard by demonstrating that the impact of its designation on the Universal Service Fund will be minimal, its designation will offer consumers in Tennessee the unique advantages of its service offering, its commitment to quality of service, its ability to provide the supported services throughout its designated service territory within a reasonable time frame, and that it will comply with the additional ongoing conditions imposed by the *Virginia Cellular Order*.

**a. Designating Advantage as an ETC Will Have Minimal Impact on the Universal Service Fund**

Advantage currently provides service to over 10,000 consumers in Tennessee. Advantage conducted a study using customer zip codes from its billing system to identify the location of its customers relative to the exchange area boundaries of the ILECs with whom Advantage competes.<sup>5</sup> Advantage calculated the total per-line support that each competing ILEC currently receives, including high cost, local switching, interstate common line, and long-term support. The individual ILEC per-line support amount was then multiplied by the approximate number of Advantage consumers residing within the

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<sup>5</sup> Advantage used subscriber counts sorted by zip code from its billing system to identify the ILEC exchanges in which its customers reside. Advantage then used data from the USAC website to calculate the appropriate amounts of USF support per line associated with each ILEC. Advantage calculated the total support available within each ILEC service area and summed the results. Advantage considers the underlying data to be highly confidential and proprietary.

competing ILEC's particular exchange and ultimately totaled. Based upon this analysis, Advantage estimates that it will receive approximately \$1,127,000 per year in USF support. This represents less than 0.13% of the high cost portion of the USF. Accordingly, grant of Advantage's ETC request will have minimal impact on the USF. The benefits of designating Advantage as an ETC outweigh any potential harm to the sustainability of the fund.<sup>6</sup>

**b. Advantage's Universal Service Offering Will Provide Unique Services to Consumers in Rural Tennessee**

As stated in its Petition, Advantage is a small B block licensee providing cellular service in rural Tennessee (Cannon, Tennessee RSA 2, CMA644). Advantage's universal service offering will speed the delivery of advanced wireless services to rural Tennesseans. Unlike traditional LEC services, mobility affords customers increased flexibility, public safety, and service options. The Commission recently noted that mobility of telecommunications assists consumers in rural areas who must drive significant distances to their jobs, schools, and critical community locations.<sup>7</sup> Accordingly, by offering the benefits of mobility, Advantage's wireless universal service offering will provide unique services to consumers in rural Tennessee.

As an ETC, Advantage will also offer a basic universal service package to subscribers who are eligible for Lifeline support. As stated in its Petition, Advantage will offer the "core" or designated services that are supported by Federal universal service

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<sup>6</sup> See *Virginia Cellular Order* at ¶ 31 (holding that 0.105% of total high-cost support does not dramatically burden the USF).

<sup>7</sup> *Virginia Cellular Order* at ¶ 29.



support mechanisms.<sup>8</sup> In addition to the core services, designating Advantage as an ETC will allow customers in rural Tennessee to choose service based on pricing, service quality, customer service, and service availability. Advantage offers mobility, access to Enhanced 911 (“E911”), expanded calling scopes and several calling plans to allow customers to purchase plans that fit their telecommunications needs. Advantage expects that its service offering will be competitive with those of the incumbent wireline carriers. Upon designation as an ETC, Advantage will make available to consumers a universal service offering through a combination of: (1) its wireless network infrastructure, using existing and additional antenna, cell-site, tower, trunking, mobile switching, and interconnection facilities, (2) roaming or other contractual arrangements with other wireless service providers, and (3) resale agreements with other wireline carriers in Tennessee as necessary.

**c. Advantage is Committed to Providing Quality Service to Requesting Customers Throughout Its Designated Service Area**

Advantage will attempt to provide service to any requesting customers in the service areas in which it is designated as an ETC. When a potential customer requests service within its existing network, Advantage will provide service immediately using its network. If a potential customer requests service within Advantage’s licensed service area but outside its existing network coverage, it will take the following steps, as necessary, to provide service: (1) modify or replace the requesting customer’s equipment

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<sup>8</sup> See 47 U.S.C. § 254(c); 47 C.F.R. § 54.101. Advantage will provide voice grade access to the public switched network, an amount of local usage free of (additional) charge, Dual Tone Multi-Frequency signaling or its functional equivalent, single party service, access to emergency services, access to operator services, access to interexchange service, access to directory assistance, and toll limitation services for qualifying low-income consumers on at least one calling plan.

to provide service; (2) install a roof-mounted antenna or other equipment to provide service; (3) adjust the nearest cell site to provide service; (4) identify and make any other adjustments that can be made to the network or customer facilities to provide service; (5) offer resold services or roaming in certain areas using another carrier's facilities to provide service; and (6) determine the feasibility of installing an additional cell site, cell extender, or repeater to provide service.<sup>9</sup> If after following these steps, Advantage still cannot provide service, it will notify the requesting party and include that information in an annual report to be filed with the Commission detailing how many requests for service were unfulfilled for the past year.

As required by the Communications Act of 1934, as amended ("Act"),<sup>10</sup> Advantage will use its Federal universal service support for construction, maintenance and upgrading of facilities serving rural areas for which such support is intended. Advantage has previously noted the terrain in middle Tennessee presents particular challenges to wireless carriers.<sup>11</sup> Advantage currently provides service using 38 cellular towers in Tennessee. Advantage estimates that it needs to build three to five additional towers to accommodate customers that reside in areas that are difficult to serve. Advantage has already budgeted to install three towers in 2004. Advantage is examining the feasibility of building eight more towers to upgrade its network and facilities to provide third-generation digital services. Advantage has also budgeted for a costly switch upgrade that will take place by May 1, 2004. Advantage's 38 existing cell sites will also be upgraded to Global Systems for Mobile communications ("GSM") at that

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<sup>9</sup> *Virginia Cellular Order* at ¶ 15. Advantage has made these additional commitments to comply with the commitments made by Virginia Cellular.

<sup>10</sup> 47 U.S.C. § 254(c).

<sup>11</sup> See Petition at 12.

time. Advantage will also upgrade its switch to GSM to accommodate wireless local number portability capability and to meet Communications Assistance for Law Enforcement Act requirements. Advantage has already installed Phase II E911 equipment at 38 cell sites and is fully Phase II compliant in the five counties in which it has received public safety answering point requests for Phase II service. Advantage will also upgrade its network with cell extenders. Additionally, Advantage will build new towers to alleviate concerns regarding dropped calls and poor coverage in its service area. Advantage has also committed to comply with the Cellular Telecommunications & Internet Association's Consumer Code for Wireless Service, which sets out certain service quality standards for wireless carriers.<sup>12</sup>

Although Advantage's build-out plans will evolve over time, Advantage will continue to respond to consumer demand by taking additional steps to ensure quality coverage and service. Further, the additional steps Advantage has committed to undertake demonstrate that it is committed to providing the supported services within the area in which it will be designated as an ETC.

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<sup>12</sup> See Section I.e., *infra*. Under the CTIA Consumer Code, wireless carriers agree to: (1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy. See *CTIA Consumer Code for Wireless Service*, available at [http://www.wow-com.com/pdf/The\\_Code.pdf](http://www.wow-com.com/pdf/The_Code.pdf).

**d. Advantage Will Advertise Supported Services Throughout Its Designated Service Area**

As stated in its original Petition, Advantage will advertise the availability of the supported services and the availability of Lifeline and Linkup services to qualifying customers. Consistent with the additional commitments made by Virginia Cellular,<sup>13</sup> Advantage will also make available additional consumer information regarding Lifeline and Linkup service in locations where qualified, unserved consumers are likely to find such information useful, including unemployment and welfare offices within its service area.

**e. Advantage will Comply with the Ongoing Conditions Recently Imposed on Virginia Cellular**

In the *Virginia Cellular Order*, the Commission imposed several ongoing conditions to ensure that Virginia Cellular satisfies its obligations under Section 214 of the Act and stated that the requirements will apply to all ETC designations for rural areas pending further action by the Commission.<sup>14</sup> Accordingly, Advantage hereby commits to: (1) annually submitting information regarding its build-out plans and progress in areas in which it is designated as an ETC along with its Section 54.313 and 54.314 filings; (2) becoming a signatory to the CTIA's Consumer Code for Wireless Service; (3) annually providing the number of consumer complaints it receives per 1,000 mobile handsets; and (4) annually submitting information regarding how many requests for service from potential customers in its designated area were unfulfilled for the past year. As required

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<sup>13</sup> *Virginia Cellular Order* at ¶ 15.

<sup>14</sup> *Virginia Cellular Order* at ¶ 4.

by the *Virginia Cellular Order*, Advantage will submit this information to the FCC and the Universal Service Administration Company every October.

## **II. Advantage Respectfully Requests Redefinition of Rural Service Areas**

In its Petition, Advantage requested to be designated as an ETC throughout its licensed CMRS territory. In this Supplement, however, Advantage is expanding its request with respect to the Ben Lomand Rural Telephone Cooperative Inc. (“Ben Lomand”) and DeKalb Telephone Cooperative, Inc. d/b/a DTC Communications (“DTC”) exchanges. Advantage is now proposing to be designated as an ETC throughout the entire service areas of Ben Lomand and DTC even though there are exchanges within each of these ILECs’ service areas that are only partially covered by Advantage’s commercial mobile radio services (“CMRS”) license. All customers residing within each of these ILEC service areas will be served through a combination of Advantage’s existing facilities and the resale of CMRS or wireline service as described below.

### **a. To the Extent Necessary, Advantage Requests Redefinition at the Wire Center Level**

Should the Commission refuse to designate Advantage as an ETC throughout the entire service area of either Ben Lomand or DTC, Advantage respectfully requests, in light of the *Virginia Cellular Order*, redefinition of the service areas of Ben Lomand and DTC at the wire center level as listed in Exhibits B and C.<sup>15</sup> Pursuant to Section 54.207(c)(1) of the FCC’s rules, a petition to define a designated service area in this manner must contain “an analysis that takes into account the recommendations of any

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<sup>15</sup> *Virginia Cellular Order* at ¶42. The FCC found that redefining the affected rural telephone company’s service areas at the wire center level reduces concerns regarding cream skimming.

Federal-State Joint Board convened to provide recommendations with respect to the definition of a service area served by a rural telephone company.”<sup>16</sup> In a *Recommended Decision*, the Joint Board enumerated three factors to be considered when reviewing a request for designation as an ETC for a geographical area that differs from a rural LEC’s entire study area.<sup>17</sup> The Joint Board advised the Commission to consider whether the competitive carrier is attempting to “cream skim” by only proposing to serve the lowest cost exchanges.<sup>18</sup> Next, the Joint Board urged the Commission to consider the rural carrier’s special status under the Act.<sup>19</sup> Last, the Joint Board recommended that the FCC consider the administrative burden a rural LEC would face by calculating its cost on a basis other than its entire study area.<sup>20</sup>

Taking the above criteria into consideration, the FCC changed its analysis in its *Virginia Cellular Order* when examining a request for redefinition.<sup>21</sup> Specifically, the FCC redefined the service areas of the affected rural LECs in the *Virginia Cellular Order* at the wire center level. The FCC found that redefining the rural telephone company service areas at the wire center level will not require the rural telephone companies to determine their costs on a basis other than the study area level. Its proposed redefinition, therefore, enables Advantage to serve an area that is smaller than the entire ILEC study

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<sup>16</sup> 47 C.F.R. § 54.207(c)(1).

<sup>17</sup> *Federal-State Joint Board on Universal Service, Recommended Decision*, 12 FCC Rcd 87, 155 (1996) (“*Recommended Decision*”).

<sup>18</sup> *Recommended Decision*, 12 FCC Rcd 87 at ¶¶ 156 & 172. Advantage addresses concerns regarding cream skinning in the next section.

<sup>19</sup> *Recommended Decision*, 12 FCC Rcd 87 at ¶¶ 172-174.

<sup>20</sup> *Recommended Decision*, 12 FCC Rcd 87 at ¶ 174.

<sup>21</sup> Although the *Virginia Cellular Order* modified the FCC’s analysis of cream skinning and administrative burdens, the FCC did not modify its analysis of the special status of rural carriers criterion in the *Virginia Cellular Order*. Because Advantage has addressed the special status of the affected rural LECs in its Petition, these issues will not be revisited here. *See* Petition at 16-19.

areas. Further, the concern that Advantage's proposed ETC designation at the wire center level in the service areas of Ben Lomand and DTC would impose additional administrative burdens on either ILEC is not at issue here.<sup>22</sup>

With respect to the other ILECs subject to this petition, Advantage now requests that the Commission redefine the service areas of certain ILECs in Tennessee – Bledsoe Telephone Cooperative Inc. (“Bledsoe”), Citizens Telecommunications Company of Tennessee d/b/a Frontier Communications (“Frontier”), North Central Telephone Cooperative Inc. (“North Central”), Twin Lakes Telephone Cooperative Corporation (“Twin Lakes”), and United Telephone Company (“United”) – at the wire center level and to include those exchanges listed in Exhibits B and C and described below within Advantage's designated ETC service area. Advantage's licensed service area covers, and Advantage's network serves, the entirety of each of the listed exchanges of these ILECs as shown in Exhibit B. Advantage will provide the supported services in these exchanges using its own network.

The ILEC exchanges shown on Exhibit C are those exchanges where Advantage is not licensed to provide CMRS service throughout the entire exchange and therefore cannot provide the supported services using its own network. However, upon designation as an ETC in these exchanges partially covered and served by Advantage, Advantage will provide supported services throughout each exchange. Advantage will accomplish this through existing contractual arrangements with other CMRS providers or by negotiating and executing additional contracts with other telecommunications carriers serving the exchanges shown on Exhibit C. For example, Advantage currently has roaming

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<sup>22</sup> *Virginia Cellular Order* at ¶44.

agreements with other CMRS carriers that would provide coverage throughout the partially served exchanges and commits that the rates it will charge those customers whose service relies entirely upon such agreements will be the same as those charged to customers residing wholly within Advantage's existing network.

**b. Advantage Will Not and Cannot Cream Skim**

Advantage has performed a population density study to prove that it will not cream skim.<sup>23</sup> Advantage used the MapInfo Exchange Plus software and Tennessee dataset to perform this analysis. The data demonstrates that Advantage's licensed service territory population density is very similar to the overall subscriber densities of the rural ILECs with whom Advantage will compete. For each rural ILEC, total service area, exchange served in its entirety, and each partially served exchange that Advantage proposes to serve as an ETC, the population and area (in square miles) is set forth and the population density calculated (population divided by square miles = subscriber per square mile). Population density has also been calculated for those portions, if any, of an ILEC service area that Advantage does not propose to serve. The chart below reveals the results of Advantage's population density study with respect to all the affected rural telephone companies.<sup>24</sup> Specifically, this chart reveals that Advantage is not serving only the low-cost, high density wire centers, and therefore, is not attempting to cream skim.

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<sup>23</sup> In the *Virginia Cellular Order*, the FCC accepted a population density study as a preferred methodology to identify high-cost areas and the potential for cream skinning. *Virginia Cellular Order* at ¶ 34.

<sup>24</sup> See also Exhibit D, which reveals the population density of the rural telephone companies for whose study areas Advantage is seeking redefinition.



<b>ADVANTAGE CELLULAR SYSTEMS</b>									
<b>SUBSCRIBER DENSITY ANALYSIS</b>									
		<b>In ACS Coverage Area</b>			<b>Out of ACS Coverage Area</b>			<b>% Covered</b>	
	<b>Total ILEC Study Area</b>	<b>POPs</b>	<b>Area (Sq Mi)</b>	<b>Density</b>	<b>POPs</b>	<b>Area (Sq Mi)</b>	<b>Density</b>	<b>POPs</b>	<b>Area (Sq Mi)</b>
<b><u>NORTH CENTRAL TELEPHONE</u></b>									
Population (2000 Census Blocks)	35,085	2,542			32,543			7.25%	
Area (square mile)	569.40		68.51			500.89			12.03%
Density	<b>61.62</b>			<b>37.10</b>			<b>64.97</b>		
<b><u>BLEDSON TELEPHONE</u></b>									
Population (2000 Census Blocks)	21,838	2,448			19,390			11.21%	
Area (square mile)	737.80		191.45			546.35			25.95%
Density	<b>29.60</b>			<b>12.79</b>			<b>35.49</b>		
<b><u>TWIN LAKES TELEPHONE</u></b>									
Population (2000 Census Blocks)	75,593	2,351			73,242			3.11%	
Area (square mile)	1,897.00		78.52			1,818.48			4.14%
Density	<b>39.85</b>			<b>29.94</b>			<b>40.28</b>		
<b><u>CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC</u></b>									
Population (2000 Census Blocks)	140,489	20,905			119,584			14.88%	
Area (square mile)	1,417.00		191.55			1,225.45			13.52%
Density	<b>99.15</b>			<b>109.14</b>			<b>97.58</b>		
<b><u>UNITED TELEPHONE</u></b>									
Population (2000 Census Blocks)	8,538	20			8,518			0.23%	
Area (square mile)	438.50		0.09			438.41			0.02%
Density	<b>19.47</b>			<b>230.57</b>			<b>19.43</b>		
<b><u>BEN LOMAND TELEPHONE</u></b>									
Population (2000 Census Blocks)	67,129	65,200			1,929			97.13%	
Area (square mile)	1,314.95		1,245.08			69.87			94.69%
Density	<b>51.05</b>			<b>52.37</b>			<b>27.61</b>		
<b><u>DEKALB TELEPHONE</u></b>									
Population (2000 Census Blocks)	40,236	33,943			6,293			84.36%	
Area (square mile)	818.90		640.80			178.10			78.25%
Density	<b>49.13</b>			<b>52.97</b>			<b>35.33</b>		

The overwhelming majority of the population and area Advantage proposes to serve is within the service areas of Ben Lomand and DTC. Since Advantage is willing to serve the entire service areas of these ILECs, there is no opportunity to cream skim.

However, further analysis is provided to demonstrate that, when calculating based only

on Advantage's existing licensed area and currently served area, there is still no opportunity to cream skim low cost customers. In Ben Lomand's service area, Advantage serves 97% of the population and 95% of the area with its own network. The total study area population density of the Ben Lomand service area, 51.05 persons per square mile, is virtually identical to the density (52.37) in the portions of Ben Lomand's service area Advantage proposes to serve. The remaining non-licensed and unserved portion of the Ben Lomand service area, representing 3% of the population and 5% of the area, has a population density of 27.61 persons per square mile.

The area that Advantage serves in the DTC service area exhibits similar characteristics. Advantage serves 84% of the population and 78% of the area with its own network. The total study area population density of the DTC service area, 49.13 persons per square mile, is also virtually identical to the density (52.97) in the portions of DTC's service area Advantage proposes to serve. The remaining non-licensed and unserved portion of the DTC service area, representing 16% of the population and 22% of the area, has a population density of 35.33 persons per square mile.

Advantage submits that the differences in population densities (between licensed, served areas and unlicensed, unserved areas) in the Ben Lomand and DTC service areas is immaterial given the very small areas that are not served by Advantage's existing network and, most important, Advantage's commitment to providing service to the entire service areas of Ben Lomand and DTC.<sup>25</sup> It is clear that Advantage is not attempting to cream skim.

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<sup>25</sup> See *Virginia Cellular Order* at ¶¶ 34-35.

In the service areas of North Central, Bledsoe, and Twin Lakes, the population density in the area Advantage proposes to serve is actually less than that of the ILEC's total service area and is also less than the population density in the remaining service territory. The population density in the Citizens service area not served by Advantage is virtually the same as that in the area in which Advantage offers service and proposes to be designated as an ETC. Advantage's population density is significantly greater in the proposed service area served by United, however the actual population (20) and area (0.09 square miles) covered by Advantage in the United service area is *de minimis*. In spite of the very small portion of the United exchange that Advantage can serve today, however, Advantage will provide service to the entire exchange if granted ETC status in that exchange.

The population density data clearly indicates that Advantage will be unable to cream skim low cost subscribers and thus will not jeopardize the ability of the ILECs to provide service in their service areas.<sup>26</sup> The data supports Advantage's request to be designated as an ETC throughout its licensed service area.

### **III. Conclusion**

Advantage is committed to providing consumers with competitive and innovative telecommunications choices and the assurance that it will use its USF support to provide all services required of an ETC. Advantage is committed to providing quality service to consumers throughout its service area and to provide the Commission with the requisite information to ensure that the public interest is served by Advantage's designation as an ETC in Tennessee. Advantage's ability to offer mobility, competitive calling plans, and

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<sup>26</sup> See *Virginia Cellular Order* at ¶ 35.

enhanced access to emergency service throughout its service area will provide public benefits that exceed the public cost.

For the forgoing reasons, Advantage hereby respectfully requests that it be designated as an ETC throughout the service areas of Ben Lomand and DTC and in the entire exchanges of the other rural ILECs as described shown and in Exhibit E.

Advantage also respectfully requests that the service areas of the rural ILECs shown in Exhibits C and D be redefined at the wire center level consistent with this petition for designation as an ETC and consistent with the *Virginia Cellular Order*.<sup>27</sup> Finally, Advantage respectfully requests immediate designation as an ETC in the BellSouth exchanges shown in Exhibit A and as set forth in its original Petition.

Respectfully submitted,

**ADVANTAGE CELLULAR SYSTEMS,  
INC.**

By: \_\_\_\_\_

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Its Attorneys

Dated: February 17, 2004

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<sup>27</sup> *Virginia Cellular Order* at ¶¶ 42-44.

Exhibit A – BellSouth “Non-Rural” Exchanges  
Advantage Seeks ETC Designation Only Within Its Licensed Service Area

<b><u>Exchange</u></b>	<b><u>CLLI Code</u></b>	<b><u>Complete or Partial Coverage</u></b>
Carthage, TN	CRTHTNMARS5	Complete
Lebanon, TN	LBNNTNMADS0	Partial
Manchester, TN	MNCHTNMADS0	Complete
Normandy, TN	WRTRTNMTRS5	Partial
Tullahoma, TN	TLLHTNMADS0	Partial
Watertown, TN	WTTWTNMARS5	Partial

Exhibit B – “Rural” ILEC Exchanges that Advantage Serves in Their Entirety

(Excludes Ben Lomand and DTC. Advantage Seeks Designation as an ETC Throughout Ben Lomand and DTC’s Entire Service Areas.)

By ILEC

**CITIZENS TELECOMMUNICATIONS COMPANY OF TENNESSEE D/B/A  
FRONTIER COMMUNICATIONS**

<b>Exchange</b>	<b>CLLI Code</b>
McMinnville, TN	MMVLTNXADS0

**TWIN LAKES TELEPHONE COOPERATIVE CORP.**

<b>Exchange</b>	<b>CLLI Code</b>
Chestnut Mound, TN	CHMNTNXARS0

**NORTH CENTRAL TELEPHONE COOPERATIVE, INC. - TN**

<b>Exchange</b>	<b>CLLI Code</b>
Defeated, TN	DFTDTNXARS5

Exhibit C – Partial Study Area  
“Rural” Exchanges Advantage Serves Partially

(Excludes Ben Lomand and DTC. Advantage Seeks Designation as an ETC Throughout  
Ben Lomand and DTC’s Entire Service Areas.)

By ILEC

**CITIZENS TELECOMMUNICATIONS COMPANY OF TENNESSEE D/B/A  
FRONTIER COMMUNICATIONS**

<b>Exchange</b>	<b>CLLI Code</b>
Cookeville, TN	ALGDTNXARS0, CKVLTNXADS0
Pleasant Hill, TN	PLHLTNXARS0
Sparta, TN	SPRTTNXARS0

**TWIN LAKES TELEPHONE COOPERATIVE CORP.**

<b>Exchange</b>	<b>CLLI Code</b>
Baxter, TN	BXTRTNXADS0
Cookeville South, TN	CKVLTNXBDS0

**BLEDSON TELEPHONE COOPERATIVE**

<b>Exchange</b>	<b>CLLI Code</b>
Fall Creek Falls, TN	FCFLTXXADS0
Pikeville, TN	PKVLTXXADS0

**NORTH CENTRAL TELEPHONE COOPERATIVE, INC. - TN**

<b>Exchange</b>	<b>CLLI Code</b>
Pleasant Shade, TN	PLSHTNXARS5

**UNITED TELEPHONE COMPANY**

<b>Exchange</b>	<b>CLLI Code</b>
Estill Springs, TN	ESSPTNXARS0
College Grove, TN	CPHLTNXADS2

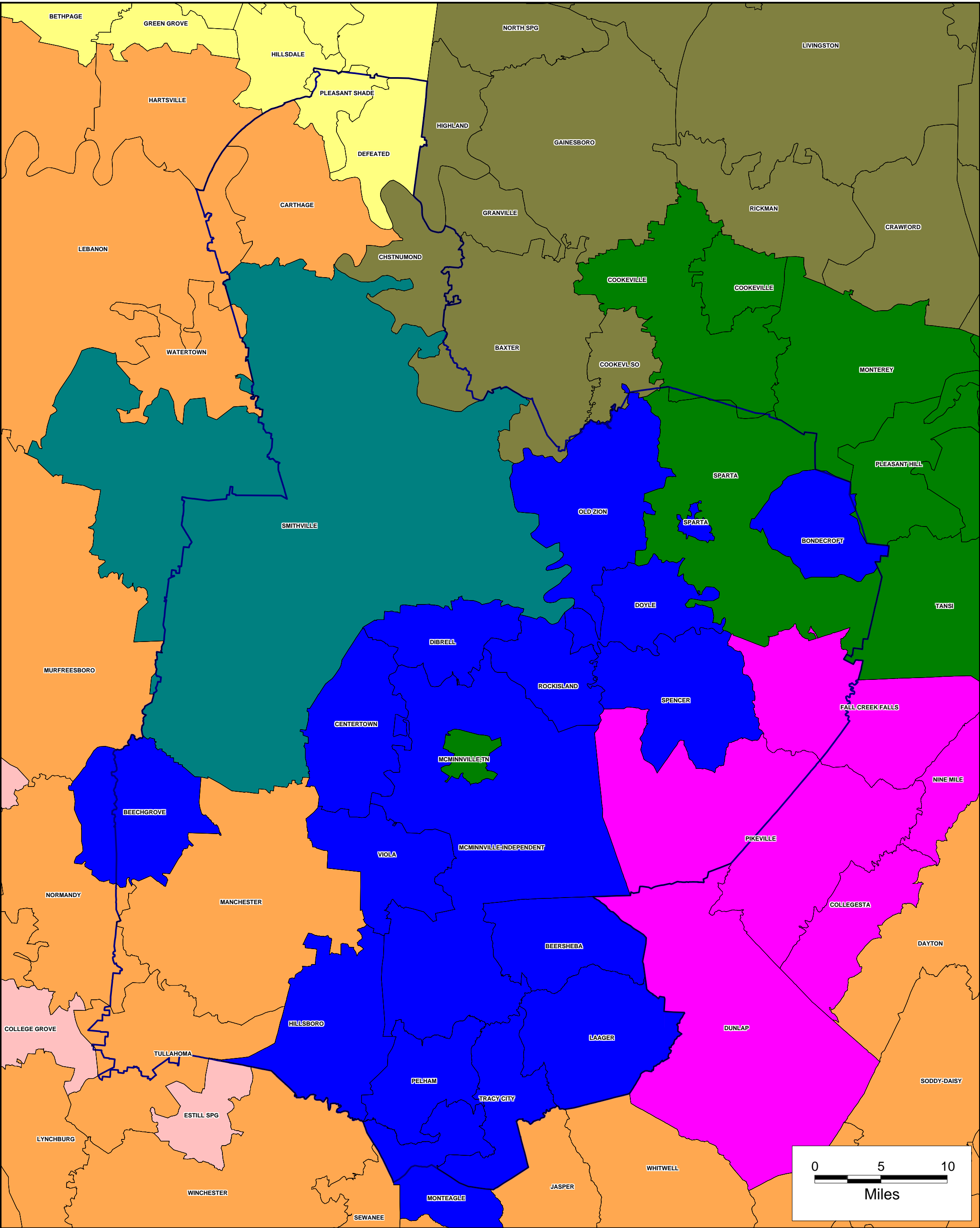
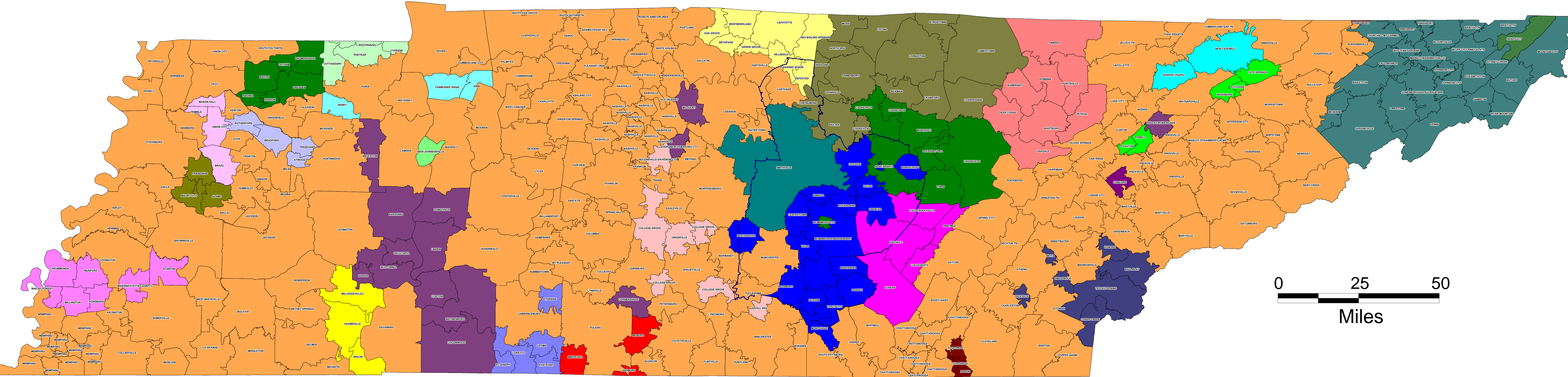
## Exhibit D – Population Density Data

COMPANY NAME	EXCHANGE	(C)omplete (P)artial	2000 Population Covered Within TN-2 RSA	Area (Square Mile) of Exchange Within TN-2	2000 Population Density per Square Mile Within TN-2	2000 Population Covered of Full Exchange	Area (Square Mile) of Full Exchange	2000 Population Density per Square Mile of Full Exchange	2000 Population Covered Outside TN-2	Area (Square Mile) Outside TN-2	2000 Population Density per Square Mile Outside TN-2
BLEDGIE TELEPHONE COOPERATIVE	FALL CREEK FALLS	P	607	62.95	15.56	3,905	131.10	27.40	2,908	88.75	37.93
BLEDGIE TELEPHONE COOPERATIVE	PIKEVILLE	P	1,451	129.10	11.24	5,376	242.90	22.17	3,925	113.40	34.61
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	WICKHAMVILLE, TN	C	9,699	11.91	814.36	9,699	11.91	814.36	-	-	-
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	COCKEYVILLE	P	60	2.54	31.47	37,559	116.40	322.66	37,479	113.66	329.16
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	PLEASANT HILL	P	6	0.49	12.16	3,822	66.77	57.24	3,816	66.29	57.55
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	SPARTA	P	11,120	176.00	62.67	11,169	177.20	62.02	49	0.60	80.00
NORTH CENTRAL TELEPHONE COOPERATIVE, INC. - TN	EDUCATED	C	1,757	45.80	38.28	1,757	45.80	38.26	-	-	-
NORTH CENTRAL TELEPHONE COOPERATIVE, INC. - TN	PLEASANT SHADE	P	765	22.61	34.73	845	24.36	34.69	60	1.75	34.29
TWINLAKES TELEPHONE COOPERATIVE CORP.	CHRISTIANMOND	C	1,660	49.67	33.66	1,660	49.67	33.60	-	-	-
TWINLAKES TELEPHONE COOPERATIVE CORP.	BAKTER	P	522	27.90	22.25	7,809	190.30	55.15	7,367	122.34	60.22
TWINLAKES TELEPHONE COOPERATIVE CORP.	COCKEYVILLE	P	60	0.89	67.64	6,200	31.69	196.93	6,149	30.80	199.62
UNITED TEL CO INC.	SOLLEGE GROVE	P	17	0.03	640.06	13,824	280.70	49.25	13,907	280.67	49.19
UNITED TEL CO INC.	ESTILL SPD	P	3	0.06	49.66	4,316	32.19	136.27	4,313	32.07	136.42



Exhibit E – Map of Advantage’s Proposed ETC Service Area





Advantage Cellular Market Boundary

TN Exchange Boundary

TN Exchange Name

{text}

Exchange Ownership

ARDMORE TELEPHONE CO., INC.	(3)
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	(199)
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	(17)
BLED SOE TELEPHONE COOPERATIVE	(5)
CENTURYTEL OF ADAMSVILLE, INC.	(3)
CENTURYTEL OF CLAIRBORNE, INC.	(2)
CENTURYTEL OF COLTWEA H-COLLEGE DALE, INC.	(3)
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	(14)
CITIZENS TELECOM-VOL ST DBA FRONTIER VOL STATE	(5)
CONCORD TELEPHONE EXCHANGE, INC.	(1)
CROCKETT TELEPHONE CO., INC.	(3)
DEKALB TELEPHONE COOPERATIVE	(1)
HIGHLAND TELEPHONE COOPERATIVE, INC. - TN	(8)
HUMPHREYS COUNTY TELEPHONE CO.	(1)
LORETTO TELEPHONE CO., INC.	(5)
MILLINGTON TELEPHONE CO., INC.	(7)
NORTH CENTRAL TELEPHONE COOPERATIVE, INC. - TN	(9)
PEOPLES TELEPHONE CO., INC.	(3)
SCOTT COUNTY TELEPHONE COOPERATIVE, INC.	(1)
SKYLINE TELEPHONE MEMBERSHIP CORP.	(1)
TELLICO TELEPHONE CO., INC.	(7)
TENNESSEE TELEPHONE CO.	(14)
TWIN LAKES TELEPHONE COOPERATIVE CORP.	(15)
UNITED INTER-MOUNTAIN TELEPHONE	(24)
UNITED TEL CO INC.	(4)
WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC.	(4)
WEST TENNESSEE TELEPHONE CO., INC.	(4)
YORKVILLE TELEPHONE COOPERATIVE	(4)



Exhibit F – Declaration

**Declaration of Leslie Greer**

I, Leslie Greer, do hereby declare under penalty of perjury the following:

1. I am the CEO of Advantage Cellular Systems, Inc.
2. I have read the foregoing “Supplement to Petition of Advantage Cellular, Inc. to be Designated as an Eligible Telecommunications Carrier.” I have personal knowledge of the facts set forth therein, and believe them to be true and correct.

\_\_\_\_\_  
/s/

Leslie Greer

\_\_\_\_\_  
2/16/04

Date